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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
TIFFANY STUART, aka Jane Doe,  
JENNIFER LANGE, and  
BRANDY DOUGLAS,  
Defendants.

No.: CR 3-05-70262 JL

STIPULATION AND ~~PROPOSED~~  
PROTECTIVE ORDER REGARDING  
COMPUTER DISCOVERY AS TO  
DEFENDANTS STUART, LANGE AND  
DOUGLAS

The United States, through its counsel of record, and the defendants, through their counsel of record, hereby agree and stipulate that the government will provide computer discovery (consisting of seized computer evidence) on the following conditions:

The computer discovery produced in this matter is deemed Protected Material. Possession of copies of the Protected Material is limited to the defendants, their attorneys of

1 record, and investigators, paralegals, law clerks, translators, interpreters, experts and assistants  
2 for the attorneys of record (hereinafter collectively referred to as "members of the defense team").

3 The defendants, their attorneys of record, and members of the defense team acknowledge  
4 that providing copies of the Protected Material to other persons is prohibited, and agree not to  
5 duplicate or provide copies of the Protected Material to other persons. The defendants, their  
6 attorneys of record, and members of the defense team may show Protected Material to witnesses  
7 or prospective witnesses in conjunction with their defense of the defendants in this case. The  
8 defendants, their attorneys of record, and members of the defense team further acknowledge that  
9 they are prohibited from using the Protected Material for any purpose other than defending the  
10 defendant in the above-captioned matter. Any violation of these prohibitions constitutes a  
11 violation of the Protective Order. Further, the attorneys of record agree that prior to  
12 disseminating any copies of the Protected Material to members of the defense team, they will  
13 provide a copy of this Protective Order to members of the defense team.

14 Notwithstanding efforts taken by the government to redact personal information of  
15 witnesses from the discovery provided to the defense (such as date of birth, social security  
16 numbers, addresses, phone numbers, etc.), defense counsel, the defendants and members of the  
17 defense team agree that, should any such information be found during their review of this  
18 material, they will not provide that personal information in any form – whether in verbal, written  
19 or electronic format – to any third party, for any reason whatsoever.

20 2 Nontermination

21 The provisions of this Order shall not terminate at the conclusion of this prosecution but  
22 only upon further order of this Court. Within 30 days of a verdict or guilty plea, the defendants'  
23 attorneys of record shall return all copies of any Protected Material (including all copies provided  
24 to the defendants, their attorneys of record, and members of the defense team) to the United  
25 States Attorney's Office for the Northern District of California.

1 IT IS SO STIPULATED.

2  
3 DATED: October 14, 2005

/s/ Monica Fernandez  
MONICA FERNANDEZ  
Assistant United States Attorney  
Counsel for the United States

4  
5  
6 DATED: October 3, 2005

/s/ Josh Cohen  
JOSH COHEN  
Counsel for Defendant STUART

7  
8 DATED: October 3, 2005

/s/ Suzanne Luban  
SUZANNE LUBAN  
Counsel for Defendant LANGE

9  
10  
11 DATED: October 13, 2005

/s/ Geoffrey Rotwein  
GEOFFREY ROTWEIN  
Counsel for Defendant DOUGLAS

12  
13  
14 **ORDER**

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16  
17 DATED: October 14, 2005

18 HONORABLE  
UNITED STATES DISTRICT JUDGE

